Edwin J. Jacobs, Jr., Esquire (NJ Attorney I.D.#2714011971) JACOBS & BARBONE, P.A. A Professional Corporation Attorneys at Law 1125 Pacific Avenue Atlantic City, New Jersey 08401 (609) 348-1125 ejacobs@jacobsbarbone.law Attorneys for Plaintiffs Marty Small and LaQuetta Small

> UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

MARTY SMALL and LaQUETTA SMALL, Case No.: 1:21-cv-08665-JHR-AMD

Plaintiffs,

Civil Action

VS.

CRAIG CALLAWAY and JOHN DOES 1-

Defendants.

PLAINTIFFS' NOTICE OF MOTION FOR REMAND TO THE SUPERIOR COURT OF NEW JERSEY, LAW DIVISION, CIVIL PART, ATLANTIC COUNTY PURSUANT TO 28 U.S.C. § 1447(c)

TO: Daniel W. Weininger, Esquire Lento Law Group, P.C. 3000 Atrium Way, Suite 200 Mt. Laurel, New Jersey 08054

PLEASE TAKE NOTICE Plaintiffs Marty Small and LaQuetta Small shall move by and through counsel, namely Edwin J. Jacobs, Jr., Esquire of the law firm of Jacobs & Barbone, P.A., upon due notice to and in the presence of Daniel W. Weininger, Esquire, of the Lento Law Group, P.C., attorneys for Defendant Craig Callaway, before Magistrate Judge Ann Marie Donio, U.S.D.J. at the United States District Courthouse, Mitchell H. Cohen Building, 4th &

Cooper Streets, Camden, New Jersey, on a date and time to be set by the Court, for an Order:

1. Remanding the above-captioned action to the Superior Court of New Jersey, Law Division-Civil Part, Atlantic County pursuant to 28 U.S.C. § 1447(c).

Plaintiff shall rely upon the brief filed in support thereof filed simultaneously herewith.

JACOBS & BARBONE, P.A.

/s/ Edwin J. Jacobs, Jr.

Dated: 4/20/21

- [] Opposed
- [] Unopposed